

From: [Lagod, Matthew](#)
To: [Jill Causse](#); [Amanda Carroll](#)
Cc: [Douglas, Martha](#)
Subject: RE: Dalton Utilities (PFAS pilot study) - Status of loan agreement
Date: Monday, March 13, 2023 8:18:00 AM
Attachments: [374Water AirSCWO updated brochure 2 1 23.pdf](#)

Good morning Jill,

Please find attached a brochure that describes 374Water's AirSCWO proprietary sustainable waste management technology. 374Water is a US-based clean tech company. As I mentioned, Florida will be piloting the AirSCWO equipment later this year.

With best regards,
Matthew

From: Jill Causse <jcausse@gefa.ga.gov>
Sent: Friday, March 10, 2023 2:10 PM
To: Lagod, Matthew <Lagod.Matthew@epa.gov>; Amanda Carroll <acarroll@gefa.ga.gov>
Cc: Douglas, Martha <Douglas.Martha@epa.gov>
Subject: RE: Dalton Utilities (PFAS pilot study) - Status of loan agreement

Hi Matthew,

Thanks for the update and yes, that would be great if you can share the source of the equipment.

Jill

Jill Causse
Project Manager 3
Georgia Environmental Finance Authority
Office: 404-584-1057
Mobile: 470-606-1426
gefa.georgia.gov

From: Lagod, Matthew <Lagod.Matthew@epa.gov>
Sent: Friday, March 10, 2023 2:06 PM
To: Jill Causse <jcausse@gefa.ga.gov>; Amanda Carroll <acarroll@gefa.ga.gov>
Cc: Douglas, Martha <Douglas.Martha@epa.gov>
Subject: RE: Dalton Utilities (PFAS pilot study) - Status of loan agreement

Dear Jill, dear Amanda,

Just a quick note to confirm that I've sent a gentle reminder to EPA HQ regarding your question about the applicability of BABA to the PFAS pilot study, and that I'll follow up with you when I have an answer. I did learn during the FL annual review this week that they are also considering a similar PFAS pilot project, and that they have located domestically-produced PFAS removal equipment, in case you'd like for me to find out more about where they sourced those from.

I'll let you know when I have news from EPA HQ about your specific question.

Best regards,

Matthew

From: Jill Causse <jcausse@gefa.ga.gov>

Sent: Tuesday, March 7, 2023 8:38 AM

To: Lagod, Matthew <Lagod.Matthew@epa.gov>; Amanda Carroll <acarroll@gefa.ga.gov>

Cc: Douglas, Martha <Douglas.Martha@epa.gov>

Subject: RE: Dalton Utilities (PFAS pilot study) - Status of loan agreement

Good morning Matthew,

I don't think DU's pilot study proposal has the level of detail that you're looking for but I've attached what we have so far if that helps.

Thanks,

Jill Causse
Project Manager 3
Georgia Environmental Finance Authority
Office: 404-584-1057
Mobile: 470-606-1426
gefa.georgia.gov

From: Lagod, Matthew <Lagod.Matthew@epa.gov>

Sent: Tuesday, March 7, 2023 8:16 AM

To: Amanda Carroll <acarroll@gefa.ga.gov>; Jill Causse <jcausse@gefa.ga.gov>

Cc: Douglas, Martha <Douglas.Martha@epa.gov>

Subject: RE: Dalton Utilities (PFAS pilot study) - Status of loan agreement

Good morning Amanda,

Thanks for your message. This is a bit of a grey area; equipment for a pilot study may not qualify as temporary equipment based on the definition in the [OMB guidance memo](#): "tools, equipment, and supplies, such as temporary scaffolding, brought to the construction site and removed at or before the completion of the infrastructure project." In this case the PFAS equipment is the focus of the project, not incidental equipment allowing the completion of an infrastructure project. I reached out to HQ last night with this question and their first reaction was that PFAS treatment would be considered a manufactured product, and therefore is covered by BABA. They are looking into this further, with the knowledge that this is a pilot project and that the equipment won't be permanently incorporated at the plant. I will let you know as soon as I hear back from them on this.

To answer your other question, yes, the [Adjustment Period Waiver](#) could apply if the project had demonstrable planning efforts completed prior to May 14, 2022. And the [De Minimis waiver](#) could also be used to cover up to 5% of the project cost.

I will reach out to you when I have the confirmation from HQ on this matter. We appreciate your patience.

Kind regards,

Matthew

From: Amanda Carroll <acarroll@gefa.ga.gov>
Sent: Tuesday, March 7, 2023 7:30 AM
To: Lagod, Matthew <Lagod.Matthew@epa.gov>; Jill Causse <jcausse@gefa.ga.gov>
Cc: Douglas, Martha <Douglas.Martha@epa.gov>
Subject: RE: Dalton Utilities (PFAS pilot study) - Status of loan agreement

Matthew,

It is my understanding that if the equipment isn't going to be permanently incorporated into the project then BABA isn't applicable to the pilot study.

Also can the national waiver apply to projects under the emerging contaminants grant?

Amanda Carroll, PMP
Senior Project Manager
Georgia Environmental Finance Authority
Mobile: 404-450-8381
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Please note: GEFA's new address is 47 Trinity Ave SW, Fifth Floor, Atlanta, GA 30334

From: Lagod, Matthew <Lagod.Matthew@epa.gov>
Sent: Monday, March 6, 2023 8:47 PM
To: Jill Causse <jcausse@gefa.ga.gov>
Cc: Douglas, Martha <Douglas.Martha@epa.gov>; Amanda Carroll <acarroll@gefa.ga.gov>
Subject: RE: Dalton Utilities (PFAS pilot study) - Status of loan agreement

Hi Jill,

Thanks for reaching out with this question, I did not have any previous conversations with Vince on this matter. It would be helpful to have a complete description of the scope with a list of proposed equipment if that is available. I'll do some checking and get back to you as soon as I can, hopefully in the next day or two. I'm on official travel this week and may not be able to respond until later in the evenings.

Kind regards,
Matthew

From: Jill Causse <jcausse@gefa.ga.gov>
Sent: Monday, March 6, 2023 4:04 PM
To: Lagod, Matthew <Lagod.Matthew@epa.gov>
Cc: Douglas, Martha <Douglas.Martha@epa.gov>; Amanda Carroll <acarroll@gefa.ga.gov>
Subject: RE: Dalton Utilities (PFAS pilot study) - Status of loan agreement

Matthew,

You may have discussed this with Vince but he's out of the office for a few weeks. We're hoping to send

Dalton Utilities a grant agreement very soon and I wanted to see if you can provide guidance on whether the BABA requirement would be applicable in this situation, since it's a pilot project. Any input would be appreciated.

Thanks,

Jill Causse
Project Manager 3
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Mobile: 470-606-1426
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From: Lagod, Matthew <Lagod.Matthew@epa.gov>
Sent: Thursday, February 23, 2023 9:32 AM
To: Jill Causse <jcausse@gefa.ga.gov>; Amanda Carroll <acarroll@gefa.ga.gov>
Cc: Douglas, Martha <Douglas.Martha@epa.gov>; Vincent Harvey II <vharvey@gefa.ga.gov>
Subject: RE: Dalton Utilities (PFAS pilot study) - Status of loan agreement

Thank you Jill for this helpful update, that is all we need to know. We will check back in April to see how the agreement is coming along. We appreciate your assistance!

Best regards,
Matthew

From: Jill Causse <jcausse@gefa.ga.gov>
Sent: Thursday, February 23, 2023 9:29 AM
To: Lagod, Matthew <Lagod.Matthew@epa.gov>; Amanda Carroll <acarroll@gefa.ga.gov>
Cc: Douglas, Martha <Douglas.Martha@epa.gov>; Vincent Harvey II <vharvey@gefa.ga.gov>
Subject: RE: Dalton Utilities (PFAS pilot study) - Status of loan agreement

Good morning,

Dalton Utilities is currently in the RFQ process, and they were planning to advertise the week of February 13th. EPD sent notification that they started the SERP process this week. We are hoping they will be able to sign the grant agreement by the end of March.

Please let me know if you require additional information.

Thanks,
Jill

Jill Causse
Project Manager 3
Georgia Environmental Finance Authority
Office: 404-584-1057
Mobile: 470-606-1426
gefa.georgia.gov

From: Lagod, Matthew <Lagod.Matthew@epa.gov>
Sent: Thursday, February 23, 2023 9:23 AM
To: Amanda Carroll <acarroll@gefa.ga.gov>
Cc: Douglas, Martha <Douglas.Martha@epa.gov>; Vincent Harvey II <vharvey@gefa.ga.gov>; Jill Causse <jcausse@gefa.ga.gov>
Subject: RE: Dalton Utilities (PFAS pilot study) - Status of loan agreement

Thank you Amanda for the quick reaction, we appreciate that so much. Very good, I will wait to hear if your colleagues Jill and Vince have any additional details on the status.

Best regards,
Matthew

From: Amanda Carroll <acarroll@gefa.ga.gov>
Sent: Thursday, February 23, 2023 9:18 AM
To: Lagod, Matthew <Lagod.Matthew@epa.gov>
Cc: Douglas, Martha <Douglas.Martha@epa.gov>; Vincent Harvey II <vharvey@gefa.ga.gov>; Jill Causse <jcausse@gefa.ga.gov>
Subject: Re: Dalton Utilities (PFAS pilot study) - Status of loan agreement

Matthew,

I believe we are still working through the scope with them so we can put together the grant agreement. I have copied Jill and Vince in this response. They would have the most up to date information for you.

Amanda Carroll

Sent from my iPhone

On Feb 23, 2023, at 9:07 AM, Lagod, Matthew <Lagod.Matthew@epa.gov> wrote:

Dear Amanda,

I hope your week is going well. I was wondering if you might be able to share with us the status of the loan agreement with Dalton Utilities for the PFAS removal pilot project. As you know, this project appeared on GEFA's 2022 CWSRF Emerging Contaminants IUP. We had highlighted this project to EPA HQ as an example of the positive impacts of BIL investments on pollution reduction, and just wanted to follow up on the status of the loan so we can assure them that it is moving forward. I didn't see this entered yet in the SRF Data System, which is normal considering it may still be in the pipeline.

Thank you for your kind assistance with this request.

Best regards,

Matthew

Matthew Lagod

Environmental Engineer

U.S. Environmental Protection Agency – Region 4

Water Division/Permitting & Grants Branch/Grants & Infrastructure Section

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